

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

UNITED STATES OF AMERICA,

vs.

DAVID TSUI,

Defendant

No. 3:20 CR 591 JFA-001

MOTION FOR AUTHORIZATION
FOR INTERNATIONAL TRAVEL

The defendant, David Tsui, by his counsel, respectfully shows the Court that:

1. On his guilty plea to a violation of 18 U.S.C. 371, he was sentenced on April 26, 2022, to 15 months imprisonment, followed by a 3 year term of supervised release.
2. He was released from Bureau of Prisons' custody on March 27, 2023, and he is now under the supervision of U.S. Probation Officer Bryson Karbley in the Middle District of North Carolina. His term of supervised release has been without incident.
3. All financial obligations have been satisfied in full.
4. The defendant's father, Charlie Tsui, now 88 years old, is planning a final trip to his home in China for two weeks in August 2023, with his extended family, and understandably wants his son, David, to go with him; and
5. The Government consents to this Motion.

WHEREFORE David Tsui, by his counsel, respectfully prays the Court for authorization to accompany his family to China for two weeks in August 2023.¹

Respectfully submitted,

/s/ Andrew Burke Moorman
Andrew Burke Moorman
Attorney for the Defendant
416 East North Street-2nd Floor
Greenville, SC 29601
(864)775-5800
Andy@andymoormanlaw.com

David W. Long
David W. Long
Attorney for the Defendant
Poyner & Spruill
Box 1801
Raleigh, NC 27602
(919)283-2808
dwwlong@poynerspruill.com

July 31, 2023.

¹ Mr. Tsui filed this Motion previously. When he filed his first Motion, he had not obtained his passport from the State Department, there was a concern that he would not obtain it in time for the trip, and the Court denied the Motion. Tsui now has his passport, and he has sent a copy of it, along with his itinerary for the trip, to the U.S. Probation Office in Columbia, South Carolina.